

United States District Court
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

REGINALD NMN HANEY

CRIMINAL COMPLAINT

Case Number:

12. mJ 14 ASB

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about December 20, 2011, in Ramsey County, in the State and District of Minnesota, defendant(s) did by force, violence and intimidation, take from the person and presence of US Bank employees approximately \$2333.00, which money belonged to and was in the care, custody, control, management and possession of US Bank located at 2850 Rice Street, Little Canada, Minnesota, the deposits of which were then insured by the Federal Deposit Insurance Corporation

in violation of Title 18, United States Code, Section(s) 2113(a).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:
SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

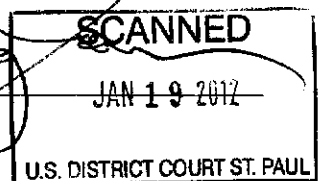
January 18, 2012
Date
The Honorable Arthur J. Boylan
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer

at

Mark R. Fredkove
Signature of Complainant
Mark R. Fredkove
FBI

Minneapolis, MN
City and State

[Signature]
Signature of Judicial Officer



STATE OF MINNESOTA)
) SS. AFFIDAVIT OF MARK R. FREDKOVE
COUNTY OF RAMSEY)

I, Mark R. Fredkove, being first duly sworn and under oath, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI). I have been an FBI Agent for seven years. I am currently assigned to a squad which investigates violent crimes, including bank robberies.

2. I make this Affidavit based on my personal knowledge and upon information provided to me by other law enforcement officials who have been involved in the investigation of the bank robbery of US Bank at 2850 Rice Street, Little Canada, Minnesota on 12/20/2011 as well as the arrest of REGINALD HANEY. This Affidavit does not contain all facts known to me regarding these matters, but only those sufficient to support a finding of probable cause.

3. On 12/20/2011, the US Bank located at 2850 Rice Street, Little Canada, Minnesota was robbed. US Bank is federally insured by the FDIC.

4. At approximately 10:33 a.m., a lone male walked into the bank and stood next to a kiosk where customers fill out bank forms and deposit slips. After waiting briefly, the robber approached a teller, handed her a handwritten note, told her that he needed to make a withdrawal and she should give him "everything in the top drawer." The note was written in pencil on a lined piece of paper and stated in part, "no silent alarm." The bank teller advised law enforcement officers that there was more wording on the note but she did not have a chance to read the entire note.

5. The teller complied with the demands and turned over \$2,333.00 in U.S. currency, including prerecorded bait money, to the robber. The robber put all the money in his pocket and took his bank robbery note. The robber then left the bank. The teller then told another bank employee to see where the guy in the blue hat goes and advised that she had been robbed. Another teller then stated aloud to "get that guy's info in the blue hat" as the robber left the bank. The US Bank's customer relations manager went out into the parking lot and noted the license plate number of a red truck that he believed the robber had entered.

6. Through witness accounts and review of bank surveillance video, it was determined that the robber was likely a black male wearing a black coat, a red shirt, bright blue winter hat, and black shoes with white accents.

7. Law enforcement officers responded to the robbery shortly thereafter. A US Bank corporate security investigator provided law enforcement officers with still photographs of the bank robber from the surveillance video. The customer relations manager advised responding law enforcement officers that the red truck was displaying Minnesota license plate 017GVR. A check through the Minnesota Department of Vehicle Services indicated that license plate 017GVR (hereinafter "Dodge Ram") is registered to a red 2004 Dodge Ram with the owner listed as

REGINALD HANEY, date of birth 11/01/1970, address 3027 14th Avenue South, Minneapolis, Minnesota. A law enforcement officer then pulled up HANEY's Minnesota driver's license photo on his laptop computer. Law enforcement officers compared HANEY's driver's license photo to the still photos of the bank robber and determined that HANEY looked similar to the bank robber.

8. Based on this information, law enforcement officers made a photo lineup of six individuals, including HANEY. The photo lineup was presented individually to the victim-teller, the customer relations manager, and a bank customer. None of the witnesses could identify HANEY in the photo lineup as the individual who robbed the bank.

9. Additionally, a US Bank employee provided law enforcement officers with bank account information for REGINALD HANEY, home address of 3027 14th Avenue South, Minneapolis, Minnesota. The bank account information indicated that HANEY opened a savings and checking account with the Little Canada Branch of US Bank on 10/14/2011. As of 12/20/2011, the savings account had a balance of -\$3.50 and the checking account had a balance of -\$492.30. The US Bank corporate security investigator also provided law enforcement officers with bank surveillance photos from 10/20/2011 and 10/31/2011 where HANEY made legitimate transactions at the US Bank in Little Canada. During the 10/20/2011 transaction, HANEY was wearing similar shoes and coat that were worn by the bank robber in the 12/20/2011 robbery of the US Bank. During the 10/31/2011 transaction, HANEY was wearing a similar coat that was worn by the bank robber in the 12/20/2011 robbery of the US Bank.

10. A review of HANEY's criminal history determined that HANEY was currently on probation with Hennepin County Probation for a robbery out of the state of Virginia. A law enforcement officer then spoke with HANEY's probation agent and emailed her still photos from the 12/20/2011 robbery of the US Bank in Little Canada, Minnesota. The probation agent advised the officer that the bank robbery was her client, REGINALD HANEY, DOB 11/01/1970.

11. A review of the history of Minnesota license plate 017GVR, indicated that the license plate number was run a total of five times, including three times by the same Maplewood police officer in the early morning hours of 09/27/2011, 10/14/2011, and 12/07/2011. A law enforcement officer contacted the Maplewood police officer and learned that he had written tickets for this vehicle for overnight parking violations at the intersection of Desoto Street and Skillman Avenue in Maplewood, Minnesota. On 12/20/2011, at approximately 6:00 pm the Maplewood police officer observed the Dodge Ram parked in the parking lot of 2024 Desoto Street in Maplewood. Additional law enforcement officers arrived in the area and surveillance was conducted on the Dodge Ram as it had been used for a bank robbery earlier in that day.

12. At approximately 6:30 pm, a black male and black female walked toward and entered the Dodge Ram. The Dodge Ram departed the parking lot. A short time later, law enforcement officers activated their emergency lights to perform a felony vehicle stop. The Dodge Ram initially pulled over to the shoulder, but suddenly accelerated away. The Dodge Ram failed to stop and law enforcement officers pursued. The Dodge Ram then slowed down and let out the female passenger,

later identified as CHRYSALYNE DENISE HONEYCUTT, DOB 11/02/1971. The Dodge Ram continued to flee for a total of approximately 6.5 miles and eventually came to a stop in the rear parking lot of 2024 Desoto Street in Maplewood. The driver exited the Dodge Ram and after a short foot pursuit and physical struggle, law enforcement officers were able to take the black male into custody. Officers determined that the driver of the Dodge Ram was HANEY.

13. Law enforcement officers conducted a search incident to HANEY's arrest and removed all property from his pockets. In HANEY's front left pant's pocket, officers found a large folded pile of cash totaling \$1,079.13. All property found on HANEY was seized, photographed and entered into evidence at Maplewood Police Department. On 12/21/2011, law enforcement officers reviewed the money that was found on HANEY incident to his arrest and compared it to the list of bait money stolen from the US Bank in Little Canada the day before. The serial numbers on five of the \$20 bills in HANEY's possession matched the serial numbers in the bait money list provided by US Bank.

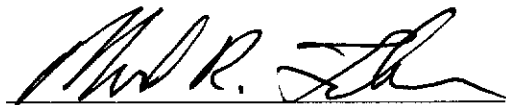
14. HONEYCUTT was also taken into custody after exiting the Dodge Ram. HONEYCUTT provided law enforcement officers with her home address as 2026 Desoto Street, Apartment #1, Maplewood, Minnesota. Law enforcement officers secured her apartment pending the issuance of a search warrant. HONEYCUTT was then transported to Ramsey County Sheriff's Office and a recorded Mirandized interview was conducted. HONEYCUTT advised that she is the sole renter of Apartment #1 at 2026 Desoto Street in Maplewood, but HANEY is in possession of a key for the residence. HONEYCUTT advised that HANEY occasionally spends the night at the apartment and maintains clothing and toiletries at the residence. HONEYCUTT further advised that HANEY arrived at her apartment at 6:00 am on the morning of 12/20/2011 and did not know what his activities were for the day. HONEYCUTT went to school around 6:45 am and returned home around 4:00 pm. HONEYCUTT advised that later on 12/20/2011 at her apartment, HANEY removed a large amount of cash from his pocket and gave her seven \$100 bills just before they left to go Christmas shopping at 6:00 pm. The \$700 was recovered from HONEYCUTT incident to her being taken into custody. HONEYCUTT advised that she did not know how HANEY obtained the money.

15. On 12/20/2011 at approximately 11:15 pm, a Ramsey County District Court search warrant was signed by the Honorable Mark Ireland. A short time later, law enforcement officers executed the search warrant on 2026 Desoto Street, Apartment #1, Maplewood, Minnesota. Law enforcement officers recovered, amongst other items, a black coat, two red shirts, a blue winter hat, and a pair of black shoes. All the items of clothing recovered were very similar to those HANEY wore during the bank robbery.

16. Following the bank robbery at US Bank in Little Canada, the Ramsey County Sheriff's Office Crime Lab processed and photographed the scene. The Deputy collected a bank's pen that was shown in the surveillance video to have been held by HANEY at the teller window during the robbery. The Deputy also processed the teller's window counter and recovered four areas of latent prints. On 12/21/2011, the Deputy conducted a comparison of HANEY's prints with those latent

prints collected off of the bank teller's window counter and determined that one of the prints was a match with HANEY's palm.

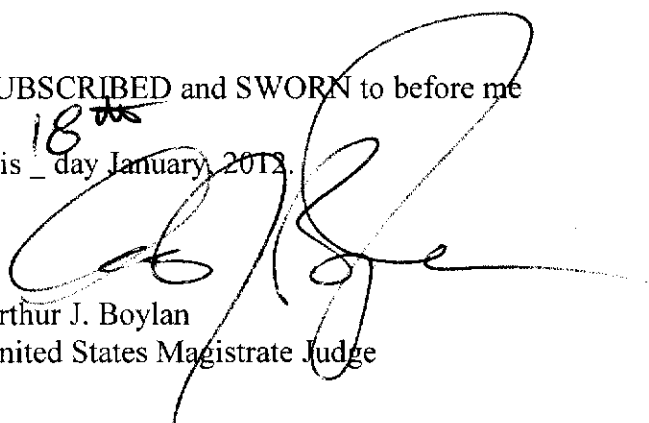
Further your Affiant sayeth not.



MARK R. FREDKOVE, Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me

this 18th day January, 2012.



Arthur J. Boylan
United States Magistrate Judge